

## United States District Court

United States District Court  
Southern District of Texas  
FILED

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

MAY 14 2015

UNITED STATES OF AMERICA  
V.David J. Bradley, Clerk  
CRIMINAL COMPLAINTRocio Centeno-Gomez  
A208 171 528

YOB: 1983

Principal  
United States CitizenCase Number:  
M-15- 0777-M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 13, 2015 in Starr County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

**knowing or in reckless disregard of the fact that Rosa Yamileth Orellana-Castillo, citizen and national of El Salvador and Frankie Steven Lopez-Lopez, citizen and national of Ecuador, along with four (4) other undocumented aliens, for a total of six (6), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location in Roma, Texas to the point of arrest in Roma, Texas,**

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On May 13, 2015, at approximately 9:45 P.M., Border Patrol Agents from the Rio Grande City Station responded to Aerostat Camera System (A5) activity in Roma, Texas in an area known as "Salinas Crossing" which resulted in the apprehension of a 1 on 6 alien smuggling case.

The area known as "Salinas Crossing" is notorious for alien and narcotics smuggling. Aerostat (A5) observed 6 subjects coming north from the Rio Grande River and load up into a SUV vehicle. A5 then observed the vehicle drive north towards U.S. Expressway 83 on Guerra Street. A5 camera operator BPA S. Yzaguirre maintained constant visual of the vehicle. A5 advised agents via the service radio of the vehicle description and continued to maintain constant visual as it continued north on Guerra Street.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No



Signature of Complainant

Michael Chandler Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

May 14, 2015  
Date

3:50 PM

at McAllen, Texas  
City and StatePeter E. Ormsby, U. S. Magistrate Judge  
Name and Title of Judicial Officer


Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-15-                      -M**

**RE:            Rocio Centeno-Gomez**

**A208 171 528**

**CONTINUATION:**

Supervisory Border Patrol Agent Benavidez encountered the suspect vehicle on Estrella Street and Guerra Street. Due to this vehicle matching the description, described by A5, SBPA Benavidez initiated a vehicle stop on the SUV vehicle. The vehicle immediately came to a complete stop at the intersection of Guerra Street and U.S. Expressway 83. Border Patrol Agents questioned the subjects separately as to their citizenship and nationality. SBPA Benavidez determined the six passengers to be illegally present in the United States. The driver claimed that she was born in Mexico and that she was a naturalized United States Citizen. The driver was identified as Rocio Centeno-Gomez. She was placed under arrest and transported to the Rio Grande City Border Patrol Station for processing.

**PRINCIPAL STATEMENT:**

Rocio Centeno-Gomez was read her Miranda rights. She stated she was not willing to provide a statement without the presence of an attorney.

**MATERIAL WITNESS STATEMENTS:**

The two material witnesses were read their Miranda rights. Both stated they were willing to provide statements without the presence of an attorney.

1. Rosa Yamileth ORELLANA-Castillo stated her family in El Salvador made her smuggling arrangements and she agreed to pay a total of \$8,000 USD to be taken to Virginia. ORELLANA is traveling with her friend's six year old son. The mother of the six year old boy is already in the United States. ORELLANA stated she and five others crossed the Rio Grande River with two guides. ORELLANA stated the guides told them once they crossed the river it was going to take them seven minutes to get to where the vehicle was waiting. ORELLANA stated the guides told them to get into the vehicle. After boarding the vehicle the guides returned back to Mexico. ORELLANA stated a female was the driver, and she and several others were on their knees in the back cargo area. ORELLANA stated one of illegals sat in the passenger side with the 6 year old boy on his lap. ORELLANA further stated the female drove for five minutes before she was pulled over by police. ORELLANA described the driver as light skinned wearing light in color shirt. ORELLANA positively identified Rocio Centeno-Gomez in a photo lineup as the driver of the blue vehicle.

2. Frankie Steven Lopez-Lopez stated that he made smuggling arrangements with an unknown subject in Ecuador. LOPEZ paid \$1,700 USD to an unknown smuggler in Miguel Aleman, Tamaulipas, Mexico to be smuggled to Queens, New York. LOPEZ crossed the Rio Grande River with five other subjects. Once across the river, the guide told them to get into a vehicle that was waiting by the river bank. LOPEZ stated that he and the five other subjects ran towards the vehicle and got into it. LOPEZ stated that once they opened the door the female in the vehicle told them to get in. He stated he got into the back cargo area of the vehicle and the driver told them to lie down and hide. LOPEZ stated that shortly after, the female driver wearing a white shirt drove off and approximately two minutes later they were stopped by Border Patrol. LOPEZ was not able to identify Rocio Centeno-Gomez in a photo lineup.